

## **EXHIBIT 20**

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*Corporation, MARTA Cooperative of America, Inc.,*  
13 *ABC Appliance, Inc., Schultze Agency Services LLC*  
*on behalf of Tweeter Opco, LLC and Tweeter Newco,*  
14 *LLC, Tech Data Corporation and Tech Data*  
*Product Management, Inc.*

15 [additional counsel listed on signature page]

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 IN RE: CATHODE RAY TUBE (CRT)  
20 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC  
MDL No. 1917

21 This document relates to:

22 *Electrograph Systems, Inc., et al. v. Hitachi,*  
23 *Ltd., et al., No. 11-cv-01656;*

24 *Siegel v. Hitachi, Ltd., et al. No. 11-cv-*  
25 *05502;*

26 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et*  
*al., No. 11-cv-05513;*

27 *Target Corp, et al. v. Chunghwa Picture*  
28 *Tubes, Ltd., et al., No. 11-cv-05514;*

**DIRECT ACTION PLAINTIFFS' FIRST  
SET OF REQUESTS FOR ADMISSION  
TO THE THOMSON DEFENDANTS**

*Interbond Corporation of America v. Hitachi, et al.*, No. 11-cv-06275;

*Office Depot, Inc. v. Hitachi Ltd., et al.*, No. 11-cv-06276;

*CompuCom Systems, Inc. v. Hitachi, Ltd., et al.*, No. 11-cv-06396;

*Costco Wholesale Corporation v. Hitachi, Ltd., et al.*, No. 11-cv-06397;

*P.C. Richard & Son Long Island Corporation, et al. v. Hitachi, Ltd., et al.*, No. 12-cv-02648;

*Schultze Agency Services, LLC, v. Hitachi, Ltd., et al.*, No. 12-cv-02649;

*Tech Data Corp., et al. v. Hitachi, Ltd., et al.*, No. 13-cv-00157;

*Sharp Electronics Corp., et al. v. Hitachi, Ltd., et al.*, No. 13-cv-01173;

*Sharp Electronics Corp. et al. v. Koninklijke Philips Electronics, N.V., et al.*, No. 13-cv-02776;

*Siegel v. Technicolor SA, et al.*, No. 13-cv-05261;

*Sears, Roebuck & Co., et al. v. Technicolor SA, et al.*, No. 13-cv-05262;

*Best Buy Co., Inc., et al. v. Technicolor SA, et al.*, No. 13-cv-05264;

*Schultze Agency Services, LLC v. Technicolor SA, et al.*, No. 13-cv-05668;

*Target Corp., v. Technicolor SA, et al.*, No. 13-cv-05686;

*Costco Wholesale Corporation v. Technicolor SA, et al.*, No. 13-cv-05723;

*Electrograph Systems, Inc., et al. v. Technicolor SA, et al.*, No. 13-cv-05724;

*P.C. Richard & Son Long Island Corporation, et al. v. Technicolor SA, et al.*,

No. 13-cv-05725;

*Office Depot, Inc., v. Technicolor SA, et al.,*  
No. 13-cv-05726;

*Interbond Corporation of America v.*  
*Technicolor SA, et al.,* No. 13-cv-05727

**PROPOUNDING PARTIES:**

Direct Action Plaintiffs Electrograph Systems, Inc. and Electrograph Technologies Corp.; Alfred H. Siegel, solely as Trustee of the Circuit City Stores, Inc. Liquidating Trust; Best Buy Co., Inc., Best Buy Purchasing LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., Bestbuy.com, L.L.C., and Magnolia Hi-Fi, Inc.; Target Corp., Sears, Roebuck, and Co., Kmart Corp.; Interbond Corporation of America; Office Depot, Inc.; CompuCom Systems, Inc.; Costco Wholesale Corporation; P.C. Richard & Son Long Island Corporation, MARTA Cooperative of America, Inc., and ABC Appliance, Inc.; Schultze Agency Services, LLC on behalf of Tweeter Opco, LLC and Tweeter Newco, LLC; and Tech Data Corporation and Tech Data Product Management, Inc.; and Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.

**RESPONDING PARTIES:**

Thomson SA and Thomson Consumer Electronics, Inc.

**SET:**

One

PLEASE TAKE NOTICE THAT, pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, the undersigned Direct Action Plaintiffs, through counsel, request that the Thomson Defendants (as defined herein) respond to the following requests for admission within thirty days of service and afterwards supplement such production as may become necessary to comply with the requirements of Rule 26(e) of the Federal Rules of Civil Procedure.

### **DEFINITIONS**

The words and phrases used in these requests shall have the meanings ascribed to them under the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Northern District of California. In addition, the following terms shall have the meanings set forth below whenever used in any request.

1. The words “all,” “any,” and “each” mean “each and every.”
2. The words “and” and “or” are both conjunctive and disjunctive as necessary.
3. The term “CRT” means cathode ray tube and includes cathode ray tubes used in color televisions and color computer monitors.
4. The term “CRT Manufacturer” means any entity that manufactures CRTs.
5. The term “CRT Product” means a finished product containing a CRT.
6. The words “including” or “includes” means without limitation.
7. The term “relevant period” means the period beginning March 1, 1995 through December 31, 2007.
8. The term “Thomson Defendants” refers collectively to Thomson SA and Thomson Consumer Electronics, Inc.
9. The term “wholly-owned subsidiary” means a legal entity that is 100% owned by another legal entity.
10. The terms “you” and “your” mean the Thomson Defendants and/or each of the Thomson Defendants, as defined herein.

### **INSTRUCTIONS**

1. Pursuant to Federal Rule of Civil Procedure 36, you are required to answer the following requests for admission under oath within 30 days or within the time otherwise required

1 by Court order.

2 2. Answer each request for admission separately and fully. In responding to these  
3 requests for admission, you are requested to furnish all information available to you, including,  
4 but not limited to, information in the possession of your attorneys. If you cannot answer any  
5 request for admission fully and completely after exercising reasonable effort and due diligence to  
6 secure any information requested, please:

7 a. so state and answer the request to the fullest extent possible;

8 b. state the facts upon which you rely to support your assertion that you are unable to  
9 answer the request fully and completely;

10 c. state what knowledge, information, or belief you have concerning the unanswered  
11 portion of the request; and

12 d. state what actions you have taken to locate the information necessary to answer  
13 each request.

14 3. Whenever a date, amount, computation, or figure is requested, the exact date,  
15 amount, computation, or figure is to be given unless it is unknown. If it is unknown, the  
16 approximate or best estimate should be given and the answer should state that the date, amount,  
17 computation, or figure provided is an approximation.

18 4. If you object to any request for admission, in whole or in part, state the reasons for  
19 any objection(s) and answer that part of the request to which you do not object. If you object to  
20 any request for admission as overbroad, respond to the request as narrowed to conform to the  
21 objection. If the answer to a request for admission is “none,” “unknown,” or “not applicable,”  
22 such statement should be written in the answer.

23 5. If you assert a claim of attorney-client privilege or attorney work product with  
24 respect to any of the request for admission contained herein:

25 a. state the factual basis of the purported privilege or claim of work product in  
26 sufficient detail so as to permit the Court to adjudicate the validity of the claim;  
27 and  
28





**REQUEST NO. 6:**

Admit that at all times from October 2005 through the present, Thomson Consumer Electronics, Inc. sold CRT Products in the United States bearing the RCA brand name.

**REQUEST NO. 7:**

Admit that at all times from the beginning of the relevant period through September 2005, Proscan was a trademark and trade name owned by Thomson Consumer Electronics, Inc.

**REQUEST NO. 8:**

Admit that at all times from October 2005 through the present, Proscan has been a trademark and trade name owned by Thomson Consumer Electronics, Inc.

**REQUEST NO. 9:**

Admit that at all times from the beginning of the relevant period through September 2005, Thomson Consumer Electronics, Inc. sold CRT Products in the United States bearing the Proscan brand name.

**REQUEST NO. 10:**

Admit that at all times from October 2005 through the present, Thomson Consumer Electronics, Inc. sold CRT Products in the United States bearing the Proscan brand name.

**REQUEST NO. 11:**

Admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product manufactured or sold by you.

**REQUEST NO. 12:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to Electrograph Systems, Inc., Electrograph Technologies Corp., ActiveLight, Inc., CineLight Corporation, International Computer Graphics, Inc., Champion Vision, Inc., or Coastal Office Products, Inc.

**REQUEST NO. 13:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to Office Depot, Inc., Tech Depot, or Office Max, Inc.

**REQUEST NO. 14:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to CompuCom Systems, Inc.

**REQUEST NO. 15:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to Interbond Corporation of America d/b/a BrandsMart USA.

**REQUEST NO. 16:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to P.C. Richard & Son Long Island Corporation.

**REQUEST NO. 17:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to MARTA Cooperative of America, Inc.

**REQUEST NO. 18:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to ABC Appliance, Inc. d/b/a ABC Warehouse.

**REQUEST NO. 19:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to Tweeter Home Entertainment Group, Inc. and its subsidiaries, affiliates and

predecessors, including, but not limited to : NEA Delaware, Inc.; New England Audio Co., Inc.; Bryn Mawr Radio and Television, Inc.; HiFi Buys Incorporated; Home Entertainment of Texas, Inc.; DOW Stereo/Video, Inc.; United Audio Centers, Inc.; Douglas T.V. & Appliance, Inc. and Douglas Audio Video Centers, Inc.; The Video Scene, Inc. d/b/a Big Screen City; SMK Marketing, Inc. d/b/a Audio Video Systems; Sound Advice, Inc. d/b/a Sound Advice and Showcase Home Entertainment; Hillcrest High Fidelity, Inc.; or Sumarc Electronics Incorporated d/b/a NOW! Audio Video.

**REQUEST NO. 20:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to Tech Data Corporation or Tech Data Product Management, Inc.

**REQUEST NO. 21:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; BestBuy.com, L.L.C.; or Magnolia Hi-Fi, Inc.

**REQUEST NO. 22:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to Circuit City Stores, Inc., or its affiliated companies.

**REQUEST NO. 23:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to Target Corp.

**REQUEST NO. 24:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to Sears, Roebuck and Co. or Kmart Corp.

**REQUEST NO. 25:**

If your answer to REQUEST NO. 11 is anything other than an unqualified admission, admit that you cannot identify the CRT Manufacturer of the CRT used in any given CRT Product sold by you to Costco Wholesale Corporation.

DATED: June 27, 2014

/s/ Philip J. Iovieno

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